

July 11, 2014

**VIA ECF FILING AND E-MAIL TRANSMISSION**

The Honorable Robert E. Gerber  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, et al. Case No. 09-50026  
(REG)  
Phaneuf No Stay Pleading**

Dear Judge Gerber:

We are counsel for plaintiffs in *Phaneuf v. General Motors LLC*, No. 1:14-cv-3298 (S.D.N.Y.). This Court heard argument on our clients' No Stay Pleading on July 2, 2014. During the hearing, the Court indicated that it intended to deny our No Stay Pleading. Your Honor asked us to send a letter stating whether we intended to appeal, so that Your Honor could provide a written opinion, if necessary.<sup>1</sup>

At this time, we do intend to appeal and would respectfully request a written opinion.

Respectfully submitted,

/s/ Jeffrey C. Block  
Jeffrey C. Block

cc: Todd S. Garber  
Arthur Steinberg

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<sup>1</sup> We understood the Court's statements on the record at the July 2, 2014 hearing to have been an announcement of a decision, but not the entry of an order within the meaning of Federal Rule of Bankruptcy Procedure 8002(a). Thus, we do not understand our time for filing an appeal to have started. If this is incorrect, we would ask the Court for a clarification, enabling us to seek an extension of the time to appeal.